

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

PARES RATLIFF)	
)	
Plaintiff,)	
)	
v.)	Case No. 10 C 739
)	
CITY OF CHICAGO, et al.,)	Judge Dow
)	
Defendants.)	

AGREED MOTION FOR JUDGMENT ON ATTORNEYS' FEES AND COSTS

NOW COME Plaintiff Pares Ratliff and Defendant City of Chicago, by their respective attorneys, and move this Court for an order granting their agreed motion for entry of judgment on attorneys' fees and costs. In support of this Motion, the parties state as follows:

1. On November 30, 2012, after a jury trial, the jury awarded Plaintiff \$30,000.00 in compensatory damages on his claims, \$15,000.75 in punitive damages against Defendant Carroll, and \$5,000 in punitive damages against Defendant Murphy.
2. Pursuant to 42 U.S.C. Section 1988, the Plaintiff is entitled to recover attorneys' fees and costs. The Parties have reached an agreement with respect to the amount of attorneys' fees and costs in favor of Plaintiff and against Defendant City of Chicago.
3. Defendant City of Chicago will pay \$375,661.31 in full satisfaction of all of plaintiff's attorneys fees claimed pursuant to 42 U.S.C. Section 1988 and \$4,275.51 in costs as to defendants City of Chicago, James Carroll and Brian Murphy.
4. The Parties respectfully request the entry of a Judgment at the Court enter a Judgment Order in accord with the Parties' agreement. A draft Order is attached as Exhibit A.

WHEREFORE, Plaintiff Pares Ratliff and Defendant City of Chicago, respectfully request that this Court grant their motion and enter a Judgment Order pursuant to the Parties' agreement.

Respectfully Submitted,

/s/ Jared S. Kosoglad

Jared S. Kosoglad, P.C.
118 S. Clinton Suite 200
Chicago, IL 60661
312-513-6000

CERTIFICATE OF SERVICE

The undersigned attorney, on oath, states that he served the above notice and the document referred therein, upon the attorneys of record via electronic filing on July 31, 2013.

/s/ Jared S. Kosoglad